

STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION

2015 NOV -5 P 4: 03

APPLICATION OF APACHE CORPORATION  
FOR APPROVAL OF THE FIRE EAGLE STATE  
SAN ANDRES EXPLORATORY UNIT, IN LEA  
COUNTY, NEW MEXICO.

CASE NO. 15401

APACHE CORPORATION'S PRE-HEARING STATEMENT

Apache Corporation ("Apache"), submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

APPLICANT

Apache Corporation  
303 Veterans Airpark Lane  
Suite 3000  
Midland, TX 79705

ATTORNEY

Earl E. DeBrine, Jr., Esq.  
Jennifer L. Bradfute  
MODRALL, SPERLING, ROEHL,  
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(505) 848-1800

**STATEMENT OF CASE**

APPLICANT:

Applicant in the above-styled cause seeks an order from the Division approving its Fire Eagle State San Andres Exploratory Unit pursuant to 19.15.20.14 NMAC. The proposed Unit Area for the Unit consists of approximately 3,360 acres of state lands situated in Lea County, New Mexico, described as follows:

Township 10 South, Range 36 East, N.M.P.M.:

Section 2: All  
Section 3: All  
Section 4: All  
Section 9: N/2

Section 10: N/2 and SW/4  
Section 11: All

The unitized interval is the stratigraphic equivalent of the San Andres formation defined at a depth of 4,243' down to the base of the formation at a measured depth of 5,643' as encountered in the Gainer 22 #1 well (API No. 30-025-38792) in Section 22, Township 10 South, Range 36 East, Lea County, New Mexico. Said subject acreage is located approximately 4.5 miles Southeast of Crossroads, New Mexico.

### PROPOSED EVIDENCE

#### APPLICANT:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Laci Lawrence – Landman	Approx. 15 min.	Approx. 6
Adam Anderson - Geologist	Approx. 10 min.	Approx. 6
Juan Garcia Vaca – Reservoir Engineer	Approx. 10 min.	Approx. 2

### PROCEDURAL MATTERS

Apache does not have any procedural matters at this time.

Respectfully submitted,

**MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.**

By: \_\_\_\_\_

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**ATTORNEYS FOR APACHE CORPORATION**